

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 21cr10154
)	
v.)	Violation:
)	
ROSEMARY GUEDES,)	<u>Count One: Conspiracy to Encourage and</u>
)	Induce Aliens to Come to, Enter, and Reside in
Defendant)	the United States
)	(8 U.S.C. § 1324(a)(1)(A)(v)(I))
)	<u>Forfeiture Allegation:</u>
)	(8 U.S.C. § 1324(b), 18 U.S.C. § 982(a)(6))
)	

INFORMATION

COUNT ONE

Conspiracy to Encourage and Induce Aliens to Come to, Enter, and Reside in the United States
(8 U.S.C. § 1324(a)(1)(A)(v)(I))

The United States Attorney charges:

From in or about January 2017 through in or about June 2020, in Framingham, in the
District of Massachusetts, and elsewhere, the defendant,

ROSEMARY GUEDES

conspired with other persons known and unknown to the United States Attorney to encourage and induce aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

FORFEITURE ALLEGATION
(8 U.S.C. § 1324(b), 18 U.S.C. § 982(a)(6))

The United States Attorney further alleges:

1. Upon conviction of Conspiracy to Encourage and Induce Aliens to Come to, Enter, and Reside in the United States, in violation of Title 8, United States Code, Section 1324, set forth in Count One, the defendant,

ROSEMARY GUEDES

shall forfeit to the United States, pursuant to Title 8, United States Code, Section 1324(b), Title 18, United States Code, Section 982(a)(6), and Title 28, United States Code, Section 2461(c), any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense; any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and any property, real or personal, used or intended to be used to facilitate the commission of the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 8, United States Code, Section 1324(b), Title 18, United States Code, Section 982(a)(6), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 8, United States Code, Section 1324(b), Title 18, United States Code, Section 982(a)(6), and Title 28, United States Code, Section 2461(c).

ANDREW E. LELLING
United States Attorney
TIMOTHY MORAN Digitally signed by TIMOTHY MORAN
Date: 2020.12.11 18:30:34 -05'00'
By: Timothy E. Moran
Assistant U.S. Attorney

Date: